

DOCKET SECTION  
BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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OFFICE OF THE SECRETARY

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POSTAL RATE AND FEE CHANGES, 1997

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Docket No. R97-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS O'HARA  
TO INTERROGATORY OF MAJOR MAILERS ASSOCIATION  
(MMA/USPS-T30-9)**

The United States Postal Service hereby files the response of witness O'Hara to the following interrogatory of Major Mailers Association, dated September 16, 1997:  
MMA/USPS-T30-9.


The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202)268-2998/FAX: -5402  
September 30, 1997

**RESPONSE OF U.S. POSTAL SERVICE WITNESS O'HARA TO  
INTERROGATORIES OF THE MAJOR MAILERS ASSOCIATION**

**MMA/USPS-T30-9.**

In your answer to MMA/USPS-T30-8 you indicate that the adjustments you made in Exhibits USPS-30F and 30G were provided to you by other pricing witnesses that are cited in your revised Workpaper III. Please also refer to your Exhibit USPS-30D, where you list percentage increases in rates and fees that are proposed by the Postal Service in this proceeding.

A) Please confirm that the Postal Service computes the proposed percentage increases by dividing the unit revenue for the test year at proposed rates by the unit revenue for the test year at current rates and subtracting one. If you cannot confirm, please explain.

B) Please confirm the following data in \$ thousands for Standard Mail A Commercial Regular mail as obtained from your revised Exhibits USPS30A, B and G and USPS-T-30, W/P 1, p.2 (revised).

	Revenues	Volumes
Current Rates	7,192,729	34,359,008
Proposed Rates	8,022,045	37,627,554

If you cannot confirm, please provide the correct data along with the appropriate support.

C) Please confirm that the unit revenues computed from data shown above in paragraph B) are .2093 for current rates and .2132 for proposed rates. If you cannot confirm please explain.

D) Please confirm that the unit revenues as shown in USPS-T-30 W/P 1,p.2 (revised) and USPS-T-30 W/P 11, p. 2 (revised) are .2093 for current rates and .2132 for proposed rates. If you cannot confirm, please explain.

E) Please confirm that the proposed percentage increase in rates for Standard Mail A Commercial Regular is 1.86%  $[(.2132 / .2093) - 1]$ . If you cannot confirm, please explain.

F) Please explain why Exhibit USPS-30D (revised) indicates that the proposed increase in rates for Standard mail A Commercial Regular is 4.1%.

G) Please explain how an intervenor in this proceeding can make comparable adjustments as shown in your USPS-T-30, W/P III (revised) under the Commission's established attributable cost methodology.

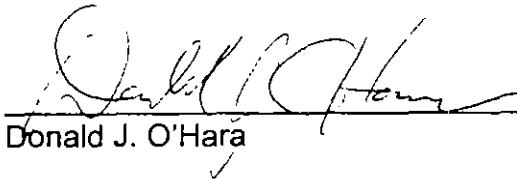
**RESPONSE OF U.S. POSTAL SERVICE WITNESS O'HARA TO  
INTERROGATORIES OF THE MAJOR MAILERS ASSOCIATION**

**RESPONSE:**

- A) Not confirmed; please see my response MPA/USPS-T30-1.
- B) Confirmed.
- C) Confirmed.
- D) Confirmed.
- E) Not confirmed; please see my response MPA/USPS-T30-1.
- F) Please see my response MPA/USPS-T30-1.
- G) Response deferred pending Presiding Officer's ruling.

DECLARATION

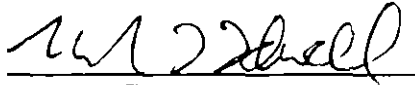
I, Donald J. O'Hara, hereby declare, under penalty of perjury, that the foregoing Docket No. R97-1 interrogatory responses are true to the best of my knowledge, information, and belief.

  
Donald J. O'Hara

9-30-97  
Date

# CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
\_\_\_\_\_  
Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1145  
September 30, 1997